

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD. and MACLAURIN
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

**MOTION TO DISMISS COMPLAINT BY DEFENDANTS
PATRICK GRUHN, ROBIN MATZKE, AND LOREM IPSUM, UG**

Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum, UG (collectively, “**LI Defendants**”) file this motion (this “**Motion**”) requesting that this Court: (a) dismiss the entirety of the Complaint [Adv. Pro. No. 1] (“**Complaint**”) of plaintiffs FTX Trading Ltd. and Maclaurin Investments Ltd. (then known as Alameda Ventures Ltd.), pursuant to Rules 12(b)(1) and (6) of the Federal Rules of Civil Procedure Rule, made applicable in the above-captioned adversary proceeding through Rule 7012(b)(1) and (6) of the Federal Rules of Bankruptcy Procedure. In support of this Motion, the LI Defendants rely upon their accompanying *Brief in Support of Motion to Dismiss Filed by Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum, UG* (“**Joint Brief**”), filed contemporaneously herewith.

WHEREFORE, for the reasons set forth in the Joint Brief, the LI Defendants respectfully request that this Court issue an order granting their Motion and dismissing the Complaint in its

entirety with prejudice and granting the Defendants such further relief as this Court may deem just and appropriate. A proposed form of order granting the Motion is attached hereto as **Exhibit A.**

Respectfully submitted,

Dated: October 27, 2023
Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
Peter J. Keane (DE Bar No. 5503)
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
pkeane@pszjlaw.com

THE DALEY LAW FIRM LLC
Darrell Daley (admitted *pro hac vice*)
Samantha Neal (admitted *pro hac vice*)
4845 Pearl East Circle, Suite 101
Boulder, Colorado 80301
Telephone: (303) 479-3500
Email: Darrell@daleylawyers.com
Samantha@daleylawyers.com

- and -

MORRISON COHEN LLP
Joseph T. Moldovan (admitted *pro hac vice*)
Heath D. Rosenblat (admitted *pro hac vice*)
Jason P. Gottlieb (admitted *pro hac vice*)
Michael Mix (admitted *pro hac vice*)
909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Email: jmoldovan@morrisoncohen.com
hrosenblat@morrisoncohen.com
jgottlieb@morrisoncohen.com
mmix@morrisoncohen.com

Counsel to Lorem Ipsum UG, Patrick Gruhn, and Robin Matzke